

Marc M. Seltzer (54534)  
mseltzer@susmangodfrey.com  
Steven G. Sklaver (237612)  
ssklaver@susmangodfrey.com  
Oleg Elkhunovich (269238)  
oelkhunovich@susmangodfrey.com  
Krysta Kauble Pachman (280951)  
kpachman@susmangodfrey.com  
Nicholas N. Spear (304281)  
nspear@susmangodfrey.com  
Michael Tayag (350113)  
mtayag@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067-6029  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150

James Q. Taylor-Copeland (284743)  
TAYLOR-COPELAND LAW  
501 W. Broadway, Suite 800  
San Diego, CA 92101  
james@taylorcopelandlaw.com  
Telephone: (619) 400-4944  
Facsimile: (619) 566-4341

*Counsel for Lead Plaintiff Bradley Sostack*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH (RMI)  
Formerly Consolidated/Related  
Case No. 4:21-cv-06518 (Closed 9-27-21)

**CLASS ACTION**

This Document Relates to:

All Actions

**DECLARATION OF JAMES TAYLOR-  
COPELAND IN SUPPORT OF  
PLAINTIFF'S OBJECTIONS TO BILL  
OF COSTS**

1 I, James Taylor-Copeland, hereby declare as follows:

2 1. I am an attorney in the law firm of Taylor-Copeland Law and counsel for Lead  
3 Plaintiff Bradley Sostack. I have personal knowledge of the matters set forth herein. If called as a  
4 witness, I could and would testify competently thereto.

5 2. I respectfully submit this declaration in support of Plaintiff's Objections to Ripple  
6 Labs, Inc.'s ("Ripple") Bill of Costs.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant's October 1,  
8 2024 Offer of Judgment.

9 4. On December 4, 2024, I met and conferred by phone with Ripple's counsel, Bradley  
10 Oppenheimer, regarding Plaintiff's objections to Ripple's Bill of Costs. We discussed both  
11 Plaintiff's objections to the timing of Ripple's Bill of Costs as well as the specific costs that Ripple  
12 is seeking. We exchanged emails regarding those objections thereafter and were unable to resolve  
13 Plaintiff's objections. A true and correct copy of that email chain is attached hereto as **Exhibit 2**.

14 5. My co-counsel, Susman Godfrey, informed me that the document management  
15 platform used to store all productions received from Ripple in this case is currently storing about  
16 922 GB of data.

17 6. Attached hereto as **Exhibit 3** is a true and correct copy of a July 9, 2021 letter from  
18 Ripple's counsel, Suzanne Nero, regarding Ripple's fifteenth production of documents. The letter  
19 notes: "These documents that were recently produced in the SEC litigation (*SEC v. Ripple Labs,*  
20 *Inc. et al.*, Case No. 20 Civ. 10832 (AT) (S.D.N.Y.)) and are now being produced to you here in  
21 the same form and manner that they were produced in that action." The vast majority of the  
22 documents produced by Ripple in this matter were accompanied by a letter containing identical or  
23 similar language indicating that those documents had been previously produced in the SEC Action.

24 I declare under penalty of perjury under the laws of the United States of America that the  
25 foregoing is true and correct.

26 Executed this 10th day of December, 2024, at North Fork, California.

27 /s/James Taylor-Copeland  
28 James Taylor-Copeland